



STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS

DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

75 Davis Street
Providence, R.I. 02908

LOD
CAN BE SIGNED
BY STAFF



SEMS DocID

642600

20 May 1983

LETTER OF DEFICIENCY
under the
HAZARDOUS WASTE MANAGEMENT ACT

Mr. Arthur F. Schwartz
Carroll Products, Inc.
Route 91
Wood River Junction, RI 02894

RCRA RECORDS CENTER
FACILITY Agency Realty
I.D. NO. R10003042216
FILE LOC. R-1C
OTHER _____

Dear Mr. Schwartz:

On May 11, 1983, personnel from the Department of Environmental Management conducted an inspection of your company. The purpose of this visit was to determine the facility's compliance status with applicable regulations promulgated pursuant to the Rhode Island Hazardous Waste Management Act of 1978, as amended. During the inspection, the following violations were documented:

1. Rule 2 - Generator Regulations

Improper storage of hazardous waste. Temporary storage areas must be designed and constructed with adequate spill control capabilities, as outlined in 40 CFR 264.175 EPA Regulations.

2. Rule 2 - Generator Regulations

No written contingency plan was maintained. A written contingency and emergency procedure plan must be maintained at the facility as outlined in 40 CFR 265.50-265.56 EPA Regulations. Arrangements must also be made with local emergency authorities as outlined in 40CFR 265.37 EPA Regulations.

3. Rule 2 - Generator Regulations

No record of personnel training. All personnel handling hazardous waste must be trained and records documenting this training must be maintained, as outlined in 40CFR 265.16 EPA Regulations.

4. Rule 2- Generator Regulations

No written inspection plan was maintained. Tanks used to treat or store hazardous waste must be inspected as outlined in 40CFR 265.194 EPA Regulations. Storage areas for hazardous waste containers must also be inspected, as outlined in 40CFR 265.174 EPA Regulations.

All records of inspections must be maintained at the facility.

5. Rule 2 - Generator Regulations

All containers holding hazardous waste must be handled and managed, as outlined in 40CFR Subpart I EPA Regulations.

6. Rule 8 - Generator Regulations

Names and signatures of all agents authorized to sign manifests must be submitted to this Department.

The Department of Environmental Management requires that you correct these deficiencies in the allotted time listed below:

- Item #1 - deadline June 24, 1983
- Item #2, #3 initial draft deadline - June 17, 1983
final draft - deadline July 8, 1983
- Item #4, #6 - deadline June 3, 1983
- Item #5 - deadline June 10, 1983

You are requested to submit all the necessary documentation to certify that your facility has complied with the aforementioned violations.

Failure to comply or to submit a request for an extension to any of the cited violations will automatically result in the issuance of a Notice of Violation and Order. Enforcement actions resulting from continued non-compliance specify a maximum fine of \$25,000, and/or five (5) years imprisonment.

All submittals shall be addressed as follows:

Department of Environmental Management
Division of Air and Hazardous Materials
204 Cannon Building, 75 Davis Street
Providence, RI 02908

Attention: Alicia M. Good

20 May 1983

As well as complying with the cited violations, I strongly recommend you conduct a complete inventory of all hazardous materials found at your facility. Materials not being used in your manufacturing process should be resold or given to industries or businesses that can use them.

I also suggest you manage your hazardous materials and empty containers in a more efficient and organized manner. If you have any questions concerning this letter, please feel free to contact me at 277-2797.

Sincerely,



Alicia M. Good, Engineer
Division of Air and Hazardous Materials

AMG/km

MANUFACTURING RECORD CARD

PRODUCT: KEX 450 CONCENTRATE

LOT NUMBER: _____

AMOUNT		MATERIAL	Charged by	Checked by	DATE
1 Drum	Drums				
		Mix thoroughly in the following order:			
23 1/2 gal		Variquat K-375			
16 1/2 gal		Triton X-207			
4 1/2 gals		Sun Par-130			
		If the above materials are cold			
		(as in winter) they should be			
		heated before mixing.			
		Mix and heat thoroughly:			
7 gals		Hexylene Glycol			
30 lbs.		Dowicide 7E C (TOXIC ^{wear gloves} _{mask})			
		when completely mixed, add ^{to} the first			
		mixture and mix thoroughly			
		Charge to drum(s)			
		REMOVE A RESERVE SAMPLE			

Net Yield: _____

Date: _____

Checked by: _____

RHODE ISLAND DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
DIVISION OF AIR AND HAZARDOUS MATERIALS

Hazardous Waste Generator Inspection

PRE-INSPECTION

1. Company Name Corvet Products
2. Contact Arthur Schwartz
3. Location Rt 91
Wood River Jet
4. Title Dir. chem operations
5. Telephone No. _____
6. EPA I.D. No. _____
7. Manifest Search

Waste Generated

Amount/Frequency

Generating Process

Printing Polymers - NaOH, H₂Cl, methyl, chrome 1000 gal/week
aqueous salt chem with organics
acidic solution → ph adjusted → gas then activated
carbon → then to 10,000 gallon storage tank
(see attached sheets)

8. Any reoccurring mistakes on manifests? ☐ Yes ☒ No
9. Only authorized agents signing manifests? ☐ Yes ☐ No (Rule 8) no list
10. Has company been inspected before? ☒ Yes ☐ No 4/20/81
11. Is this inspection the result of a complaint? ☐ Yes ☒ No

ONSITE CONFERENCE

12. Was company called before inspection? ☒ Yes ☐ No
13. Date 4/23
14. Present for company A. Schwartz
15. Inspector(s) A. Gaud, J. Hittler, J. Len
16. Have copy of generator regulations? ☒ Yes ☐ No
17. Generator's Business printing polymer + surfactants
iron oxide blending
chromic acid
take in a lab at work

18. Process Description

Physical
 Surfactant - No waste
 Iron oxide - blended floor washings go to lagoon
 soap + bleaches - "
 Oils - hydraulic from elevator - boiler room oil
 methylene chloride - used to extract water from product
 closed system (with other reused) water phase goes thru activated carbon
 EDH
 not before United States many possible ground water contamination

19. Are wastes currently generated the same as Page 1? ☒ Yes ☐ No

20. Any treatment, reclamation or disposal onsite? ☒ Yes ☐ No

ph adjust activated carbon - photoregenerated carbon test when next sent out

21. All wastes investigated for potential hazard? ☒ Yes ☐ No (Rule 7)

22. Temporary storage in containers? ☐ Yes ☒ No Greater than 90 days? ☐ Yes ☐ No

23. Temporary storage in tanks? ☒ Yes ☐ No Greater than 90 days? ☐ Yes ☒ No

24. Inspection program adequate? ☐ Yes ☒ No (265.174 Containers; 265.194 Tanks)

25. Does facility have contingency plan? ☐ Yes ☒ No (Obtain copy) (265, Subpart D)

26. Does facility have training program? ☐ Yes ☒ No (Obtain copy) (265.16)

27. Does facility maintain manifests? ☒ Yes ☐ No

28. Have the following arrangements been made: (265.37(a))

1. Familiarize agencies with layout, etc. ☒ Yes ☐ No

2. Primary authority when more than one agency. ☐ Yes ☒ No ☐ N.A.

3. Agreements with State response, contractors and suppliers. ☐ Yes ☐ No ☒ NA

4. Familiarize hospitals with hazardous waste. ☐ Yes ☒ No

29. Or, have attempts to make arrangements been made? ☒ Yes ☐ No ☐ N.A. (265.37(b))

30. Was DEM notified of any spills? ☒ Yes ☐ No (Rule 9)

FACILITY INSPECTION

31. Process tour? ☒ Yes ☐ No
32. Temporary container storage area? ☐ Yes ☐ No If no, go to 41.
33. Adequate spill control? ☐ Yes ☒ No (Rule 2) *gravel floor*
34. Containers in good condition? ☒ Yes ☐ No (265.171)
35. Container compatible with waste? ☒ Yes ☐ No (265.172)
36. Containers closed? ☐ Yes ☐ No (265.173(a)) *NA Tank*
37. Containers handled to cause leak? ☐ Yes ☐ No (265.173(b)) *NA*
38. Containers with I or R waste 50 feet from property line? ☒ Yes ☐ No (265.176)
39. Any IWM in storage? ☐ Yes ☒ No If yes, complete:
1. IWM in same container? ☐ Yes ☐ No (265.177(a))
 2. Hazardous waste in unwashed container which contained IWM? ☐ Yes ☐ No (265.177(b))
 3. Hazardous waste stored near IWM? ☐ Yes ☐ No (265.177(c))
40. Do labels contain the following information? (Rule 4)
1. Generator's name and address ☐ Yes ☐ No
 2. Waste type ☐ Yes ☐ No
 3. Manifest number ☐ Yes ☐ No
 4. D.O.T. shipping name ☐ Yes ☐ No
 5. Date of containerization ☐ Yes ☐ No (262.34(a)(2))
 6. Words "Hazardous Waste" ☐ Yes ☐ No (262.34(a)(3))
41. Temporary storage in tanks? ☒ Yes ☐ No If no, go to 51.
42. Does storage of I, R or IWM create hazard? ☐ Yes ☒ No (265.192(a))
43. Does hazardous waste corrode tank? ☐ Yes ☒ No (265.192(b))
44. Does uncovered tank have either: 2 Ft. Freeboard ☐ Yes ☐ No (265.192(c))
or
Spill Control ☐ Yes ☐ No
45. Means to stop inflow of continuous feed? ☒ Yes ☐ No (265.192(d))
46. Hazardous waste removed at closure? ☐ Yes ☐ No (265.197) *NA*

47. Is I or R wastes in tank either: (265.198(a))

1. Treated immediately to be not I or R. ☐ Yes ☐ No
2. Protected from ignition or reaction. ☐ Yes ☐ No
3. Used for emergencies only. ☐ Yes ☐ No

48. Does I or R waste tank comply with NFPA buffer zone requirements in Tables 2-1 through 2-6 of Flammable and Combustible Code--1977? ☐ Yes ☐ No (265.198(b))

49. Does IWM in same tank create hazard? ☐ Yes ☐ No (265.199(a))

50. Is hazardous waste placed in tank that contained IWM? ☐ Yes ☐ No (265.199(b))

51. Is facility operated to minimize fire, explosion and release? ☒ Yes ☐ No (265.31)

52. If needed, does facility have: (265.32)

1. Internal communications ☒ Yes ☐ No ☐ N.A.
2. Telephone ☒ Yes ☐ No ☐ N.A.
3. Fire and spill control equipment ☒ Yes ☐ No ☐ N.A.
4. Water, sprinklers or foam ☒ Yes ☐ No ☐ N.A.

53. Is equipment tested and maintained? ☐ Yes ☐ No (265.33)

54. If needed, do personnel have access to alarms? ☐ Yes ☐ No ☐ N.A. (265.34(a))

55. If needed, does one employee have access to telephone? ☐ Yes ☐ No ☐ N.A. (265.34(b))

56. If needed, is adequate aisle space maintained? ☐ Yes ☐ No (265.35)

57. Comments Laura Rikleen EPA Tues

Tetrachlorethylene 642 well

Sun Chemical used to be here

Dead inventory - could cause problem - handling of raw chemicals
other wastes left behind

Presently - non-contact cooling water + floor drains go to lagoons
have 2 tanks (3000 + 4000 gal) plan on storing all
floor drain wastes in tanks and discharges to lagoons
after wastes are tested

Oils

INSPECTION FOLLOW-UP

58. Does contingency plan comply with 265 Subpart D? If no, attached review. ☒ Yes ☐ No

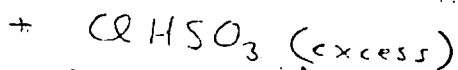
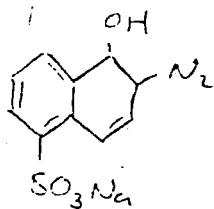
59. Does training program comply with 265.16? If no, attached review. ☒ Yes ☐ No

60. Recommended action:

☐ Letter of Compliance

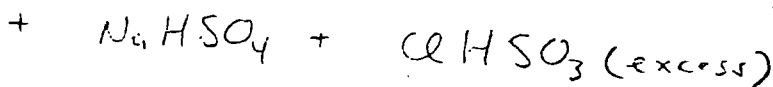
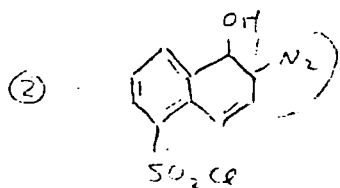
☒ Letter of Deficiency

☐ Notice of Violation



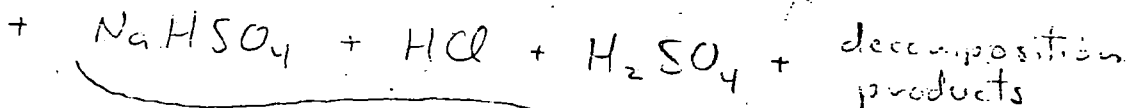
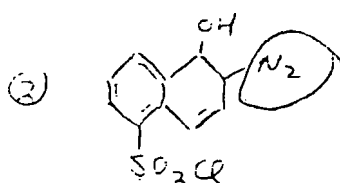
50-55°C

3rd floor process mixing
non-coolant cooling waters → lagoon



ice water
< 5°C

2nd floor quenched → drops
product out



centrifuged 2nd

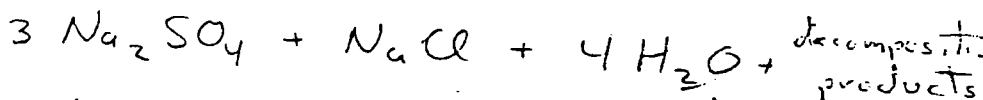
③

solid goes to methylacrylate
then out

50% NaOH
to pH 10

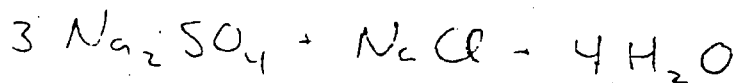
neutralization

④ sent to
3rd

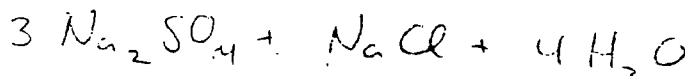


2nd floor

Activated Carbon } filtered off



HCl
to pH 4-9 ⑤



then goes to
100 gallon
storage tank

- ① ~~Na~~ 125 (2-Diazo-1-Naphthol-5-Sulfonic Acid Sodium Salt)
- ② Diazo Q 215 (2-Diazo-1-Naphthol-5-Sulfonyl Chloride)
- ③ Filtrate
- ④ pH adjustment to remove heavy metals and carbon treatment to remove organic decomposition products
- ⑤ pH adjustment to bring filtrate into a non-hazardous waste category